

In re:)		
)	Case No.	09-51245
NATCO, INC.)	Chapter 11	
Debtor)		

MEMORANDUM IN SUPPORT OF
FIRST *EX PARTE* MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADINGS

An extension is necessary, as undersigned counsel is new to the case and needs an opportunity to obtain and review all documents and resolve administrative matters related to the representation of E.O. Undersigned counsel forwarded an engagement letter to E.O. on Thursday, August 27, 2009 and expects to be formally retained in the next three days. Also, undersigned counsel has just requested a password from the Clerk of Court for filing pleadings

into this matter. Furthermore, undersigned counsel will contemporaneously seek admission before this court on a *pro hac vice* basis.

Undersigned counsel hereby certifies that there have been no previous extensions of time within which to answer, move, or otherwise respond to the Complaint filed in this action and that the plaintiff has not filed in the record an objection to an extension of time.

WHEREFORE, Defendant respectfully moves this Court on an *ex parte* basis for an extension of time up to and including September 28, 2009, within which to answer or otherwise file responsive pleadings to the Complaint in this action.

Respectfully submitted,

/S/Richard W. Martinez

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CERTIFICATE OF SERVICE

I certify that a copy of the above and foregoing *Memorandum in Support of First ExParte Motion for Extension of Time to File Responsive Pleadings* has been served on all parties on the attached service list by U.S. First Class Mail, this 28th day of August, 2009.

/S/Richard W. Martinez
RICHARD W. MARTINEZ

SERVICE LIST

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